

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC., et al.,

CV 08-0042 (JG)(VVP)

Plaintiff,

v.

**PANALPINA WORLD TRANSPORT
(HOLDING) LTD., et al.,**

Defendants.

STIPULATION AND [PROPOSED] ORDER

WHEREAS Defendants Geodis S.A. and Geodis Wilson USA, Inc. (collectively “Geodis Defendants”) and Plaintiffs Precision Associates, Inc., Anything Goes LLC d/b/a Mailboxes Etc., JCK Industries, Inc., RBX Industries, Inc., Mary Elle Fashions, Inc., Inter-Global, Inc., Zeta Pharmaceuticals, LLC, Kraft Chemical Company, Printing Technology, Inc., David Howell Product Design Inc., Innovation 714 Inc., Mika Overseas Corporation, and NORMA Pennsylvania Inc. (collectively “Plaintiffs”) have reached an agreement to settle Plaintiffs’ claims against the Geodis Defendants in this Action; and

WHEREAS Plaintiffs will move the Court for preliminary and final approval of the settlement;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel, AND ORDERED by the Court, that:

Pending the Court’s final approval of the Settlement Agreement between the Parties, and the corresponding dismissal and release of all claims by Plaintiffs against the Geodis Defendants,

all proceedings between Plaintiffs and the Geodis Defendants shall be suspended, including all applicable deadlines and discovery obligations.

Dated : May 9, 2014

Dated : May 9, 2014

s/ Brian A. Ratner

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Dated : May 9, 2014

s/Daniel E. Gustafson

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Dated : May 9, 2014

s/ Steven N. Williams

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Dated : May 9, 2014

s/ Christopher Lovell

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*Plaintiffs' Interim Co-Lead Counsel and Settlement
Class Counsel*

IT IS SO ORDERED:

This ____ day of _____, 2014.

HONORABLE VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE